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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRIGHTHOUSE LIFE INSURANCE
COMPANY; and BRIGHTHOUSE
SECURITIES, LLC,

Plaintiffs,

v.

GEORGE SCHMIDT, JR.; LINCOLN
FINANCIAL ADVISORS CORPORATION;
and LINCOLN FINANCIAL SECURITIES
CORPORATION,

Defendants.

Case No. 2:21-cv-01078-JCM-VCF

**STIPULATION AND ORDER
TO EXTEND DEADLINE FOR
LINCOLN FINANCIAL ADVISORS
CORPORATION TO FILE RESPONSIVE
PLEADING TO COMPLAINT**

[First Request]

Under Local Rules IA 6-1 and 7-1, Defendant Lincoln Financial Advisors Corporation (“LFA”) and Plaintiffs Brighthouse Life Insurance Company and Brighthouse Securities, LLC (collectively “Plaintiffs”), by and through their attorneys, hereby stipulate and request that the Court extend the deadline for LFA to file its responsive pleading to Plaintiffs’ First Amended Complaint (“FAC”) from April 14, 2023, up to and including May 3, 2023.

In support of this Stipulation, the parties state as follows:

1 1. On June 7, 2021, Plaintiffs filed their Complaint asserting claims against LFA, among
2 others. [ECF No. 1].

3 2. Plaintiffs amended their complaint on November 24, 2021. [ECF No. 15].

4 3. On November 30, 2021, LFA moved to dismiss Plaintiffs' FAC under FRCP 12(b)(1)
5 and 12(b)(6). [ECF No. 20].

6 4. Plaintiffs filed their Opposition to LFA's Motion to Dismiss Plaintiffs' FAC on
7 February 4, 2022. [ECF No. 31].

8 5. On February 25, 2022, LFA filed its reply in support of its Motion to Dismiss
9 Plaintiffs' FAC. [ECF No. 37].

10 6. On March 31, 2023, this Court entered an order granting in part, and denying in part,
11 LFA's Motion to Dismiss Plaintiffs' FAC ("Order"). [ECF No. 52].

12 7. The Court's March 31, 2023 Order triggered LFA's 14-day deadline to file its
13 responsive pleading to Plaintiffs' FAC.

14 8. LFA's counsel needs additional time to investigate and prepare an appropriate
15 response to Plaintiffs' remaining claims.

16 9. This is LFA's first request to this Court for an extension of time to respond to
17 Plaintiffs' FAC, the request is in good faith and not for the purposes of delay, and the requested
18 extension will not prejudice any party.

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10. The parties stipulate and request that the Court extend the deadline for LFA to file its responsive pleading to Plaintiffs' First Amended Complaint from April 14, 2023, up to and including May 3, 2023.

DATED this 13th day of April, 2023.

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By: /s/ Sarai L. Brown

By: /s/ Tara U. Teegarden

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 4-17-2023